

Brick, David

From: MAUGHAN, JASON [AG/1850] <jason.maughan@monsanto.com>
Sent: Tuesday, December 06, 2016 5:49 PM
To: Brick, David
Subject: RE: EPA Request for P4 Monsanto NPDES Re-Application
Attachments: P4 Production LLC Supplemental Data Work Plan 120616.pdf

Follow Up Flag: Follow up
Flag Status: Completed

David,

Please see the attached work plan outlining the details and schedule related to P4's collection of supplemental data. This data is being collected in response to your September 15th 2016 comments on the P4 Draft Permit Application submittal (specifically Comment #5).

The attached work plan also details the collection of supplemental Phosphorus data, which is intended to support the IDEQ's revision of the Bear River/Malad River Subbasin Assessment TMDL Plan.

Please let me know if you have any questions or comments related to the work plan.

Thanks

Jason Maughan
Sr. Environmental Regulatory Specialist
Monsanto - Soda Springs, ID
Office: 208-547-1239

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From: MAUGHAN, JASON [AG/1850]
Sent: Wednesday, November 02, 2016 8:10 AM
To: 'Brick, David'
Subject: RE: EPA Request for P4 Monsanto NPDES Re-Application

Hello David,

In response to your comments on the Draft P4 LLC. NPDES Permit Application, please my responses in red below.

Should you have any questions or further comments on the Permit Application, please send me an email or give me a call at 208-240-1540.

Thank you for your time and efforts to work with us on this permit development.

Jason Maughan
Sr. Environmental Regulatory Specialist
Monsanto - Soda Springs, ID



From: Brick, David [<mailto:brick.david@epa.gov>]
Sent: Thursday, September 15, 2016 6:11 PM
To: MAUGHAN, JASON [AG/1850]
Subject: RE: EPA Request for P4 Monsanto NPDES Re-Application

Hi Jason, my comments on the P4 Production Draft Application are below. Comments #3, #4, #4a, and #4b refer to suggestions on the materials you noted were absent: namely, the CERCLA discharge information.

I hope these suggestions and comments on the Draft Application are useful. Please note these comments do not signify that your draft application is incomplete or complete, nor do they imply if you complete all the recommendations that the submitted application would be complete or incomplete. The completeness of the application is determined after the official application is received.

Let me know if you have any questions or would like to call to discuss.

Comment #1

The Facility Map designated a RCRA 90-day Storage on the map, but no RCRA Permit No. is listed on Form 1 Section X. Is the map and the permit listings accurate?

A 90-day storage area is an area at which generators can accumulate hazardous waste for up to 90 days without a RCRA permit so long as certain requirements are satisfied. See 40 CFR 262.34. By designating an area on the Facility Map as a "RCRA 90-day Storage" area, we were indicating that waste is stored in that area for less than 90 days in compliance with the 90-day storage requirements, such that no RCRA permit is required. Thus, the area is not RCRA-permitted and there is no RCRA permit number. The facility is a Large Quantity Generator and has been assigned EPA ID# IDD081830994. The map and the permit listings are accurate.

Comment #2

The Water Flow Diagram lists Well Water (Wells 01-04) as 2800 gpm. It would be useful if each well was listed separately with their unique flow rates. Also make sure the points where flows combined are accurate – do all 4 wells combined into a single point prior to use in cooling and process water? In general, it is recommended that the Well Operations be more clearly defined. E.g. are all wells generally operating at the same time? Cycled? Etc.

We revised the Water Flow Diagram in the final permit application package, which was submitted on 09/30/16, to include an indication of how the wells are operated. As the water demand in the plant is very cyclical in nature, a dynamic water supply system is employed to provide water on an as needed basis. Water is supplied to the plant via four wells as follows:

- Plant Well 03 (PW03) is the primary well which provides a majority of the water to the plant. PW03 is operated using a variable frequency drive (VFD) which allows the flow rate to fluctuate with demand.
- Plant Well 01 is currently configured as a supplemental well and it is controlled to begin pumping when PW03 cannot supply enough water to the plant at any given time.
- Plant Well 02 is currently configured as a backup to PW03 and PW01. PW02 is only operated when PW03 and PW01 cannot supply enough water to the system.

- Water from PW03, PW01, and PW02 is pumped to an elevated tank (pressurization tank) which feeds the “Raw Water” header. The raw water header distributes water throughout the plant.
- PW04 is operated primarily as the potable water supply for the plant’s drinking water system. However, PW04 water is also utilized to supply water to a steam generating boiler within the plant.

Comment #3

The Water Flow Diagram has 100% of the Well Water going to Single Pass Cooling Water & Process Water. Is it accurate that none of the water pumped from these four wells will go through the proposed treatment process for the Superfund groundwater? If not, consider Comment #4a.

Due to the Superfund activities currently in progress at the P4 Superfund site, we anticipate changes to the site’s water system(s) in the near future. However, we are not at a point within the Superfund process to hazard a guess as to what those changes may or may not include. P4 has neither formally provided EPA Superfund staff with proposed preferred or alternate remedies nor have EPA Superfund staff approved proposed preferred or alternate remedies associated with the site’s Superfund activities. For this reason, P4 encourages EPA NPDES permitting staff and EPA Superfund staff to coordinate the NPDES permit renewal process to align with the Superfund site supplemental / focused remedial investigation and feasibility study process.

Comment #4

The application does not discuss the pumping, treatment, or use of Superfund Contaminated Groundwater in the application. It is recommended that the facility include information regarding the proposal so the permit can, as much as possible/practicable, be written to accommodate planned future treatments/upgrades. The section to include this information would be Form 2C Section IV. Improvements. Further recommendations are below.

Comment #4a

Consider including two Water Flow Diagrams – one for the Present flows, and one for Proposed flows including the Superfund contaminated groundwater. The Proposed Water Flow Diagram could include estimated flows to the groundwater treatment system from the wells and clearly demonstrate which wells are contributing water to the groundwater treatment system, or directly to NCCW, or both.

Please see the response to Comment #3.

Comment #4b

Consider adding Contaminated Groundwater (Proposed) as an Operation Contribution Flow under Form 2C Section II.B. Consider including an Estimated Average Flow and Proposed Treatment Descriptions.

Please see the response to Comment #3.

Comment #5

The data provided in Form 2C Section V will be used to determine Pollutants of Concern and, if necessary, conduct a Reasonable Potential Analysis. For pollutants that have detectable levels and only have 1 sample have a large multiplier in determining reasonable potential (See Technical Support Document For Water Quality-based Toxics Control Table 3-1 & 3-2, pg 57). If P4 collects additional data (and submits the data to EPA) this data could provide a more robust data set for EPA to use in determining Reasonable Potential and determining Permit Limits.

P4 is gathering supplemental data to support the accurate development of an appropriate Pollutants of Concern list. A detailed schedule and defined scope of work for the data collection is being developed and will be submitted to David Brick.

Comment #6

A list of additives and dosages currently used in the facility would assist in identifying Pollutants of Concern.

This information was included with the final permit application package which was submitted to the EPA Office of Water and Watersheds (NPDES Permits Unit) on 09/30/16.

David Brick

Permit Writer | NPDES Permits Unit
US EPA Region 10 | Seattle, WA
Phone: 206-553-1389
E-mail: brick.david@epa.gov

From: MAUGHAN, JASON [AG/1850] [<mailto:jason.maughan@monsanto.com>]
Sent: Thursday, September 01, 2016 12:24 PM
To: Brick, David <brick.david@epa.gov>
Subject: RE: EPA Request for P4 Monsanto NPDES Re-Application

David,

Attached are draft versions of the NPDES application forms you requested. As discussed, we will submit the final versions by no later than October 1, 2016.

The draft version of form 2C attached to this email includes the concentration of certain constituents you asked us to include if believed to be present. Please note, however, that P4 does not discharge process waste water; thus, these constituents are believed to be present in P4's discharges due largely to their presence in intake water.

The final version of form 2C will include the narrative for section IV.B, which we are still drafting. This narrative will provide much the same information we discussed during the meeting we had with you, the EPA CERCLA Representatives, and Idaho DEQ staff a few weeks ago – i.e., the anticipated implementation of a CERCLA remedy to address groundwater constituents and the need for Idaho DEQ to revise the Bear River TMDL for Soda Creek for total phosphorus to account for P4's existing discharges (which had been inadvertently overlooked).

We look forward to reviewing your comments to the attached and working with you to ensure a good outcome.

Thanks,

Jason Maughan
Sr. Environmental Regulatory Specialist
Monsanto - Soda Springs, ID
Office: 208-547-1239



From: Brick, David [<mailto:brick.david@epa.gov>]
Sent: Thursday, August 25, 2016 3:38 PM
To: MAUGHAN, JASON [AG/1850]
Subject: RE: EPA Request for P4 Monsanto NPDES Re-Application

Hi Jason,

As discussed we have agreed to extend the P4 Monsanto Re-Application Deadline to October 1st, 2016. We have also agreed that P4 Monsanto will supply a Draft Application directly to me by the original deadline on September 1st, 2016. I will review the Draft Application and provide any comments or feedback to you prior to October 1st.

Thank you and if you have any questions feel free to contact me at any time.

David Brick

Permit Writer | NPDES Permits Unit

US EPA Region 10 | Seattle, WA

Phone: 206-553-1389

E-mail: brick.david@epa.gov

From: Brick, David

Sent: Friday, May 06, 2016 2:25 PM

To: jason.maughan@monsanto.com

Subject: EPA Request for P4 Monsanto NPDES Re-Application

Hi Jason,

After reviewing the NPDES Application for P4 Monsanto that is currently on file from December 22, 1981, I have determined that I need additional and updated information in order to proceed with re-issuing the P4 Monsanto NPDES Permit. This is because the data is 35 years old and may not be representative of current practices at the P4 Monsanto plant, and/or does not reflect changes that may have occurred in the source water (groundwater).

For the NPDES Application please complete and send in following forms:

- (1) General Information Form 1
- (2) NPDES Permit Application Form 2C

In addition to the default sampling required by the Permit Application forms, I am requesting the following:

- (1) Intake sampling for all pollutants that are marked "believed to be present," in addition to the normally required Effluent sampling for all pollutants that are marked "believe to be present." This sample should be taken before the intake water comes into contact with any processes, heat exchangers, additives, etc. within the facility. In 1981 the following contaminants were listed as "believed to be present:"
 - a. Bromide, Color, Fecal Coliform, Fluoride, Nitrate-Nitrite, Nitrogen, Total organic (as N), Oil and Grease, Total Phosphorus (as P), Total Alpha, Total Beta, Total Radium, Total Radium 226, Sulfate (as SO₄), Sulfide (as S), Sulfite (SO₃), Aluminum, Total Barium, Total Boron, Total Cobalt, Total Iron, Total Magnesium, Total Molybdenum, Total Manganese, Total Tin, Total Titanium, Total Antimony, Total Arsenic, Total Beryllium, Total Cadmium, Total Chromium, Total Copper, Total Lead, Total Mercury, Total Nickel, Total Selenium, Total Silver, Total Thallium, Total Zinc, Total Cyanide, and Total Phenols.
 - b. If P4 Monsanto believes any of these contaminants to no longer be present in their discharge and would mark them as "Believed Absent," please include a list of all parameters which are no longer believed to be present and an explanation as to why they are no longer believed to be present. The EPA strongly encourages P4 Monsanto to test for all parameters that were above the Level of Detection in the 1981 application.
- (2) At a minimum, the following parameters must be tested in the intake and effluent water: Total Phosphorus, Oil & Grease, Total Suspended Solids, Cadmium, Fluoride, Nitrate-Nitrite, Selenium, and Manganese.

- (3) If any of the requested testing has already been completed within the past 12 months and is a representative sample which followed EPA sampling requirements, there is no need to re-sample; P4 Monsanto may send the sample results from earlier tests within the past year.

All completed forms should be sent directly to the following address on or before **September 1st, 2016** at the following address:

Audrey Washington, Mail Stop: OWW-191
Office of Water & Watersheds, NPDES Permits Unit
1200 Sixth Avenue, Suite 900
Seattle, WA 98101

Thank you for your assistance and if you have any questions feel free to contact me at any time.

David Brick

Permit Writer | NPDES Permits Unit
US EPA Region 10 | Seattle, WA
Phone: 206-553-1389
E-mail: brick.david@epa.gov

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